

# **Exhibit 1**

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

In re Application of Loudmila Bourlakova

*Plaintiff*

v.


*Defendant*

Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

The Clearing House Payment Company L.L.C.  
114 Avenue of the Americas, 17th Floor, New York, New York 10036*(Name of person to whom this subpoena is directed)*

 **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Please see attached Notice of Subpoena and Attachment A to this Subpoena

Place: Pryor Cashman LLP, 7 Times Square New York, New York, 10036	Date and Time:  03/20/2024 11:59 am
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 02/20/2024

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk*

/s/ Daniel J. Pohlman

*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Loudmila and Veronica Bourlakova, who issues or requests this subpoena, are:

Daniel J. Pohlman, 7 Times Square, 41st Floor, New York, New York, dpohlman@pryorcashman.com (212) 326-0823

**Notice to the person who issues or requests this subpoena**

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
 \_\_\_\_\_.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
 \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
 \_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

Print

Save As...

Add Attachment

Reset

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

## **ATTACHMENT A**

Pursuant to the accompanying Subpoena, petitioners Loudmila Bourlakova and Veronica Bourlakova (collectively the “Petitioners”) hereby request that Clearing House Payments Company L.L.C. (“CHIPS”) produce documents responsive to the requests listed below at the date and location specified in the Subpoena.

## **DEFINITIONS**

As used herein, the terms listed below shall be defined as follows. Insofar as a term is not explicitly defined, the meaning to be used is the commonly accepted definition of the term. Notwithstanding any definition set forth below, each word, term, or phrase used in these requests is intended to have the broadest possible meaning permitted under the Federal Rules of Civil Procedure. In these requests, the following terms are to be given their ascribed definitions:

1. “CHIPS,” “You” and “Your” shall refer to Clearing House Payments Company L.L.C. as well as all past or present parents, subsidiaries, agents, employees, attorneys, consultants, representatives, and any other person acting or purporting to act on its behalf.

2. In accordance with Local Civil Rule 26.3, the term “document” is defined to synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Federal Rule of Civil Procedure 34(a)(1)(A). A draft or non-identical copy is a separate document within the meaning of this term.

3. In accordance with Local Civil Rule 26.3, “communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise.)

4. In accordance with Local Civil Rule 26.3, “person” is defined as any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

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5. In accordance with Local Civil Rule 26.3, the terms “all,” “any,” and “each” shall each be construed as encompassing any and all.

6. In accordance with Local Civil Rule 26.3, the connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

7. The terms “referring to,” “relating to,” “showing,” or “regarding” shall mean containing, describing, discussing, embodying, commenting upon, identifying, incorporating, summarizing, constituting, comprising, or otherwise pertinent to the matter or any aspect thereof.

8. In accordance with Local Civil Rule 26.3, “concerning” means relating to, referring to, describing, evidencing, or constituting.

9. In accordance with Local Civil Rule 26.3, the use of the singular form of any word includes the plural and vice versa.

10. The use of a verb in any tense shall be construed as the use of the verb in all other tenses.

**INSTRUCTIONS**

1. A request for a document shall be deemed to include a request for any and all file folders within which the document was contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the document in addition to the document itself.

2. If and to the extent documents are maintained in a database or other electronic format, produce along with the document(s) software that will enable access to the electronic document(s) or database as you would access such electronic document(s) or database in the ordinary course of your business.

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3. These Requests do not seek information protected by applicable privileges, including attorney-client privilege or work product privilege. Any document withheld from production based on a claim of privilege or any similar claim shall be identified by (1) the type of document, (2) the general subject matter of the document, (3) the date of the document, and (4) such other information as is sufficient to identify the document including the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and the addressee to each other. The nature of each claim of privilege shall be set forth.

4. Documents attached to each other should not be separated.

5. Documents not otherwise responsive to this subpoena shall be produced if such documents mention, discuss, refer to, or explain documents called for by this subpoena.

6. If you object to any part of any request, state fully in writing the nature of the objection. Notwithstanding any objections, nonetheless comply fully with the other parts of the request to which you are not objecting.

7. These Requests cover the time period of January 1, 2018 to present.

**DOCUMENT REQUESTS**

1. All Documents and Communications, including any wire transfer notes, regarding transfers or settlement payments made by or to or otherwise concerning or referencing:

**a. Individuals:**

- i. Alexey Yurievich Planson
- ii. Daniel Tribaldos
- iii. Denis Anatolevich Smirnov
- iv. German Aleksovich Krasnoshekov
- v. Nikolai Kazakov

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- vi. Oleg Bourlakov
- vii. Reuwen Schwarz
- viii. Semen Anufriev
- ix. Svetlana Kazakova
- x. Vera Kazakova

**b. Entities:**

- i. Acorn Services Inc
- ii. Admiral Invest LLC
- iii. Amblex Trading Ltd
- iv. Asakren Trading Ltd
- v. Avanda Services Ltd
- vi. Blinton Trading Ltd
- vii. Canford Trading Corp.
- viii. Captain Vrungel Yachting Limited
- ix. Columbus Holding and Enterprises SA
- x. Cordax Trading SA
- xi. Edelweiss Investment Holding SA
- xii. Edelweiss Investment Real Estate SA
- xiii. Edelweiss Investment S.P. SA
- xiv. Edelweiss Investment S.PB SA
- xv. Edelweiss Investments Inc.
- xvi. Finco Financial Company Inc.
- xvii. Fundacion Cantucci

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- xviii. Gatiabe Business Inc.
- xix. Gefan Trading Ltd
- xx. Heda Airlines Limited
- xxi. Hemaren Stiftung
- xxii. Hydrangea Group S.A.
- xxiii. IPEC International Petroleum Co. Inc.
- xxiv. Irtum Trading Ltd
- xxv. Jovellanos Investments Corp.
- xxvi. KESK Stiftung
- xxvii. Krasnodarpromzheldortrans OJSC
- xxviii. Leo Services Holding LTD
- xxix. Leo Trust Switzerland AG
- xxx. Monston Trading Ltd
- xxxi. Mont-Blanc P.B. SA
- xxxii. OOO Admiral Invest
- xxxiii. OOO GeoKompas
- xxxiv. Privdeni Preporod Doo Banja Luka (also known as Economic Revival)
- xxxv. White Pearl SARL
- xxxvi. Wlamil 2
- xxxvii. Wlamil 3
- xxxviii. Wlamil Foundation

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**c. Accounts identified by IBAN number:**

- i. IBAN: AE020440001621305948574
- ii. IBAN: AE090261324450697655544
- iii. IBAN: AE400440001626394112184
- iv. IBAN: AE420440001628495890494
- v. IBAN: AE730440001628945099458
- vi. IBAN: CH020020620645896202M
- vii. IBAN: CH030020620645896261L
- viii. IBAN: CH080020620645896201E
- ix. IBAN: CH1008755057388100100
- x. IBAN: CH120020620650959962N
- xi. IBAN: CH120020620657631270C
- xii. IBAN: CH140020620645896230D
- xiii. IBAN: CH170020620645896270X
- xiv. IBAN: CH170020620650959901J
- xv. IBAN: CH290020620657631201A
- xvi. IBAN: CH310020620690889960V
- xvii. IBAN: CH360020620645896260C
- xviii. IBAN: CH3908515684003948532
- xix. IBAN: CH400020620657631260N
- xx. IBAN: CH400206620610452061C
- xxi. IBAN: CH460020620645896263H
- xxii. IBAN: CH510020620645896262R

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- xxiii. IBAN: CH540020620610452061C
- xxiv. IBAN: CH6908755053666000100
- xxv. IBAN: CH730020620645896231F
- xxvi. IBAN: CH7608755013335200100
- xxvii. IBAN: CH79 0020 6206 2609 6260 R
- xxviii. IBAN: CH880020620645896271D
- xxix. IBAN: CH930020620610406360V
- xxx. IBAN: CH9508515834950688905
- xxxi. IBAN: EE061700017000763453
- xxxii. IBAN: EE141700017000065685
- xxxiii. IBAN: EE181700017000044855
- xxxiv. IBAN: EE342200221056375063
- xxxv. IBAN: EE781700017000044842
- xxxvi. IBAN: LI7408802695004958411
- xxxvii. IBAN: LI7508802569004592234
- xxxviii. IBAN: LU210086893221395048
- xxxix. IBAN: LU220086586982134952
- xl. IBAN: MC4114508000001510718100460
- xli. IBAN: MC41145080000015107181004B60
- xlii. IBAN: MC52145080000015107181002Z02
- xliii. IBAN: MC5811999000010176608000245
- xliv. IBAN: MC5812739000700004859438179
- xlv. IBAN: MC5812739000700634675433464

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xlvi. IBAN: MC5816038000010101119033372

xlvii. IBAN: MC5816038000010101119097877

xlviii. IBAN: MC6714508000015107181001Y35

**d. Other accounts:**

i. Account Number: 0206-00458962.01E

ii. Account Number: 0206-00458962.31F

iii. Account Number: 0206-00458962.60C

iv. Account Number: 0206-00458962.61L

v. Account Number: 0206-00458962.62R

vi. Account Number: 0206-00458962.63H

vii. Account Number: 0206-00458962.S2

viii. Account Number: 0206005763120001

ix. Account Number: 0835-1788416-51

x. Account Number: 0835-1788416-52

xi. Account Number: 0835-1788416-52-1

xii. Account Number: 101119

xiii. Account Number: 206-260717

xiv. Account Number: 206-260962.60R

xv. Account Number: 206-458962.02M

xvi. Account Number: 206-458962.70X

xvii. Account Number: 206-458962.71D

xviii. Account Number: 206-458962.90A 0291

xix. Account Number: 206-458962.90B 0029

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- xx. Account Number: 206-458962.90M 0286
- xxi. Account Number: 206-458962.90N 0288
- xxii. Account Number: 206-458962.90Q 0021
- xxiii. Account Number: 206-458962.90R 0026
- xxiv. Account Number: 206-458962.90U 0027
- xxv. Account Number: 206-458962.90V 0295
- xxvi. Account Number: 206-609599.01J
- xxvii. Account Number: 30.101119\_0
- xxviii. Account Number: 301010455469
- xxix. Account Number: 4070281070000000792
- xxx. Account Number: 407028406000000030023
- xxxi. Account Number: 40817810300006101964
- xxxii. Account Number: 40817840900000000004
- xxxiii. Account Number: 40817978508900004197
- xxxiv. Account Number: 42301810200005105740
- xxxv. Account Number: 42301840800001500003
- xxxvi. Account Number: 42301978900005100259
- xxxvii. Account Number: 42306810900005112287
- xxxviii. Account Number: 42307978355860011823
- xxxix. Account Number: AE840030013499568456334
- xl. Account Number: EE852200221059544493
- xli. Account Number: J023195.001
- xlii. Account Number: LI0208802546889405923

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xlili. Account Number: LI74 0880 2695 0049 5841 1

xliv. Account Number: LI7508802569004592234

xliv. Account Number: R-536660.001

xlvi. Account Number: W-573881.001

xlvi. SWIFT: HABAEE2X

xlvi. SWIFT: NDEAEE2X

xlix. SWIFT: SABRRU2P